

CALIFORNIA DEPARTMENT OF CHILD SUPPORT SERVICES

TRAINING PROGRAM CONCEPT PAPER



DRAFT #2

NOVEMBER 2000

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PURPOSE

The purpose of this document is to present the vision and approach of the Department of Child Support Services (DCSS) to establish and implement a statewide professional California's Child Support Training Program (hereafter referred to as Training Program).

BACKGROUND

California enacted legislation in 1999 to completely re-engineer the manner in which child support services are delivered statewide. Many of the specific problem areas that served to frame the legislation were documented in a California Bureau of State Audits (BSA) review of the Child Support Enforcement Program (CSEP) published in August 1999. The findings that led to reform of the child support program focused on the lack of state leadership, coordination and integration between state and local child support agencies, and uniform policies, forms and procedures for local child support agencies. The overwhelming thrust of the legislation is the desire to build an effective child support enforcement program through strong State leadership and effective oversight and management.

As a result, DCSS was established and designated the single organizational entity responsible to administer the Title IV-D State plan for securing child and spousal support, medical support, and determining paternity. The Director of DCSS is given direct oversight and supervision of the Title IV-D operations of local child support agencies, including prescribing the manner in which programs shall be operated. In addition, DCSS is directed to develop uniform forms, policies and procedures to be employed statewide by all local child support agencies. It is in this regard that the statute identifies the specific areas upon which DCSS should focus and prominently features and emphasizes the importance of training.

The BSA report found that the State had failed to develop and provide adequate training and that "one of the most significant problems with California's CSEP is a lack of consistency in delivery of service from county to county." The report stated, "...it is critical that [DCSS] take the initiative in training not only its own staff but the CSEP staff at the county level." Thus, the reform legislation mandates DCSS to "develop uniform training protocols, require periodic training of all child support staff, and conduct training sessions as appropriate" (Section 17306(b)(8) of the Family Code).

In July 2000, the Director of DCSS established the Program, Policies, and Procedures Project (P3 Project) to develop recommendations in the areas specified in the reform legislation. The effort brought together all stakeholders to participate in 11 subject matter specific workgroups. One of the workgroups focused on training and has provided important guidance and recommendations in framing this document. In fact, this document is intended to build upon the work of the P3 Project Training Workgroup in providing additional direction and structure for development and implementation of a child support program Training Plan. (Note: Readers should refer to P3 Project Training Workgroup Report). Therefore, it is within this context that DCSS offers its vision and approach to in establishing California's Child Support Training Program.

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VISION

DCSS believes that a state-directed, uniform, carefully planned and executed training program is an essential element, if not the most important element, in ensuring the success of California's child support program. DCSS is responsible to lead the effort to re-engineer the child support program toward uniformity and in this regard must not only provide the vision for what the program should be, but also must successfully lead the process to implement the vision. A professional, comprehensive, and uniform training program for both DCSS and local child support agencies is an essential element in achieving our overall child support program vision.

DCSS also believes that a uniform professional training program is a means to enhance the professional standing and respect for those who work in the child support program. The opportunity for child support program staff to build professional competencies is an important performance measure. The skill and manner in which staff delivers services directly impacts the overall effectiveness of the child support program.

Finally, DCSS believes that a State-directed, professional, comprehensive and uniform training program is a mandatory and fundamental investment in the child support program that directly translates to the quality of services to the public.

GOALS

The goals of the DCSS training program are:

- To ensure that staff at all levels who work in the California child support program has the skills to do their job efficiently and effectively.
- To ensure that the California child support program is being administered in a uniform manner throughout the State.
- To ensure that local child support agencies have the tools to meet expected statewide performance measures.
- To ensure that everyone who works in the California child support program has uniform tools to provide accurate and consistent information to all customers.
- To ensure that individuals and agencies that interface with, or are served by, the California child support program are appropriately informed about the program (linked to DCSS education and outreach efforts).

GUIDING PRINCIPLES

DCSS will provide strong state leadership to establish and operate a professional, high quality Training Program for California's child support program. The DCSS leadership

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role in formulating and operating the Training Program will be guided by the following principles:

- Training curricula must be uniform throughout the State in order to provide accurate and consistent information to all customers and to comply with statutory mandates.
- Continued partnership with stakeholders is critically important to the design and implementation of an effective Training Program.
- Models of excellence exist and should be built upon and not reinvented.
- Curriculum design should be based on the knowledge and skill sets necessary to perform specific functions at all levels within the child support program.
- A variety of methods to deliver training and the appropriate technology should be available in recognition of the operating needs of those to be trained.
- The Training Program should be dynamic and subject to continuous quality improvement in recognition of the evolving nature of the child support program.

GOVERNANCE AND ORGANIZATIONAL STRUCTURE

The Training Program will be developed, directed and implemented under the leadership of DCSS with the guidance and participation of child support program stakeholders. DCSS will make training a priority within its organizational design and resource commitment. The Department has taken initial steps within its newly proposed organization to accomplish implementation of the Training Program but will seek additional guidance on specific resource needs. The currently envisioned governance and organizational structure is as follows.

A. Training Program Advisory Group

DCSS will establish a Training Program Advisory Group consisting of representatives of local child support agencies and other key stakeholder groups to advise the Department in developing and implementing the Training Program. It is likely that this group will be representative of the same groups that participated on the P3 Project Training Workgroup as well as local labor representatives. DCSS will request stakeholder input and confirmation of specific representatives to be members of the Advisory Group.

It is likely that the Advisory Group will seek other expert input as needed by establishing *workgroups or committees* to focus in particular subject matter areas. For example, the Advisory Group may wish to establish a workgroup for curriculum

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development, training material development, or other topics. The Advisory Group will identify and seek additional input as appropriate.

B. DCSS Organizational Structure

DCSS will use a matrix management approach in providing leadership and support to development and implementation of the Training Program.

- DCSS *Director* Curtis Child will provide overall leadership to the effort.
- DCSS *Chief Deputy Director* Carole Hood will be the *Executive Sponsor* and will provide direction and guidance to the effort and coordination as necessary with other initiatives underway within the Department.
- The *Branch Chief for Human Resources* within the Administrative Services Division (CEA I level) will be the *Project Director* responsible for day-to-day management and supervision of the development and implementation of the Training Program. Although this position is currently vacant, the recruitment process is underway with an anticipated start date of January 1, 2001.
- DCSS will provide *staff support* for this project from two areas: the DCSS State staff training function within the Human Resources Branch (1.0 AGPA), and the Training Unit within the Policy Branch of the Child Support Services Division (4.0 positions – 3 AGPA and 1.0 clerical). The Training Unit will have ongoing responsibility for implementation of the Training Program including establishing processes to: certify trainers; maintain, modify and develop standardized training curricula; maintain the training library; evaluate training effectiveness; maintain the inventory of training resources; and arrange for the provision of training as needed.
- Local child support agency *loaned staff* (2 to 4 staff) will be loaned to DCSS to work full time on the initial development and implementation of the Training Program. It is anticipated that the loaned staff will work full time on this effort for a period of 6 to 12 months. The loaned staff will travel to Sacramento and other locations as needed, but will remain headquartered in their home counties. Appropriate funding will be made available to cover “backfill” costs of loaned staff if necessary.
- Local labor representatives will also be asked to participate in this project to ensure labor-related issues are identified and resolved to allow for timely implementation of the Training Program.

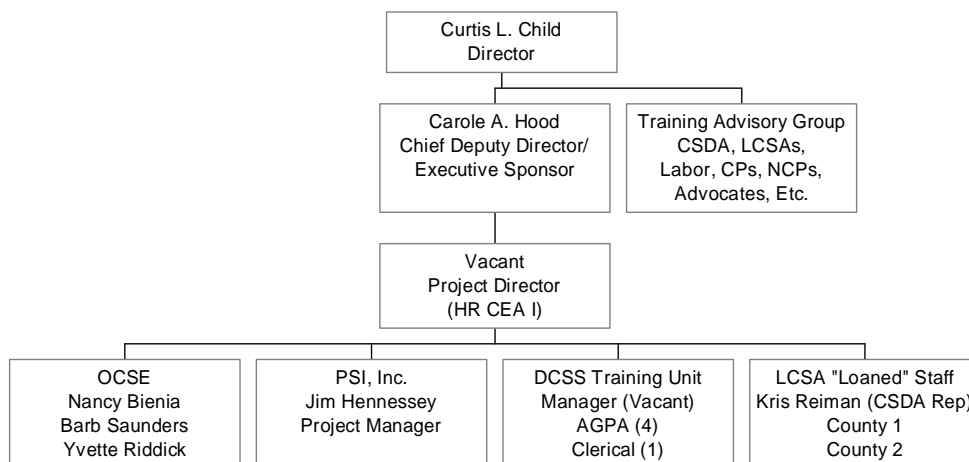
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C. Federal Consultation Services

The federal Office of Child Support Enforcement (OCSE) is dedicating additional resources to assist California. OCSE support includes:

- Selection of California as the State in which a model training inventory and needs assessment will be developed. OCSE recently awarded *Task Order #15* to develop a state child support training needs analysis model to *Policy Studies Inc. (PSI)*. *Jim Hennessey*, former IV-D Director for the State of Iowa is a PSI Vice President and Project Leader for the Task Order. The work performed under this task order will be referred to hereafter as the "OCSE/PSI Training Project."
- The purpose of the project is to develop and implement a model to identify and evaluate current training strategies and programs in place within a State; conduct a needs assessment to identify current and future training needs; and develop recommendations on creating or changing the existing training organizational structure with the State to enhance service delivery. At the end of the project, PSI will provide a "National Training Inventory Model" and a "National Needs Assessment Model" that is applicable nationwide. The period of performance is one year from October 1, 2000 through September 28, 2001.
- OCSE consultant services have also been dedicated to this effort through *Barbara Saunders*, former IV-D Director for the State of Ohio, who will be assigned full-time to this project.
- OCSE has given a high priority to the success of this project and has already and will continue to contribute the support and assistance of *Nancy Bienia*, *Special Assistant for California*, and *Yvette Riddick*, *Chief, National Training Center*.

**Child Support Training Program
Functional Organization**



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APPROACH

It is the intent of DCSS to build upon the work of the P3 Project Training Workgroup to expeditiously develop and implement a professional, comprehensive, and uniform Child Support Training Program. It is also the intent of DCSS to use the OCSE/PSI Training Project to expedite our ability to move forward quickly. Although it is recognized that full implementation of the statewide Training Program will take some time, it is important that training begin as soon as possible for those individuals in designated high priority positions/functions. DCSS is interested in bringing about significant cultural change in the way the child support program is delivered as well as specific knowledge improvements. It is recognized that this will be a work in progress; however, there is no time to waste in getting started.

For initial planning purposes, DCSS outlines in this document key tasks and suggested timeframes to develop and implement a Training Program. It should be noted that some tasks would be performed simultaneously. The tasks fall into six areas:

- A. Conduct Training Needs Assessment
- B. Inventory Existing Training Resources
- C. Select and/or Develop Quality Training Curricula
- D. Develop a Comprehensive Training Plan
- E. Practice Continuous Quality Improvement
- F. Develop Professional Standards and Recognition Program

A. Conduct Training Needs Assessment

The Training Program will be developed based on a thorough and comprehensive assessment of the training needs of those to be trained. There are at least two key parts to this effort -- to identify who needs to be trained and to identify specific training needs. The P3 Project Training Workgroup provided a good starting point that will be built upon as part of the OCSE/PSI Training Project. PSI will develop and test a training needs assessment model as one of its deliverables. Tasks include:

1. Identify and Prioritize Who Needs to be Trained (Complete by 12/1/00)

The P3 Project Training Workgroup identified all child support stakeholders, grouped them into five functional categories, and priority ranked each category to denote urgency in implementing a comprehensive training program. The approach is sound and begins the process to identify and set priority rankings for those to be trained. The general categories (condensed to four) and priority rankings are:

Priority #1: Current State and local child support program employees. This category was further delineated by function such as supervisors, managers, caseworkers, attorneys, and others.

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Priority #2: Child support program partners that directly help carryout the program. This group of partners is not under the exclusive control and direction of DCSS, however, they are funded through the IV-D program and their performance is critical to overall program success. The grouping includes Court Commissioners, Family Law Facilitators, IV-D Court Clerks, District Attorneys, and others.

Priority #3: Child support program partners that interface in carrying out the program and need specific “how to” instructions to enhance relationships. This group includes federal agencies, State agencies, local agencies and programs, and private parties (employers, financial institutions, and medical providers). (Note: combines category #3 and #4 of the original proposal from the P3 Project Training Workgroup).

Priority #4: Individuals and groups for whom a targeted education and outreach effort could enhance their understanding of the services provided, assist them in serving their clients, and generally improve their view of the child support program.

Additional consideration of the training groupings and priority rankings will be given to ensure broad consensus among stakeholders, including labor representatives. It is also important to reaffirm the scope of training to be included within the Training Program. The approach presented by the P3 Project Training Workgroup includes activities that DCSS is more inclined to define as education and outreach. DCSS is in the process of appointing an Assistant Director for Public Affairs and Outreach, who will provide the leadership to develop and implement a statewide child support education and outreach program. Thus, category #4 may be beyond the scope of the Training Plan and more appropriate for consideration as part of the planned education and outreach program.

2. Identify the Training Needs of Each Group (Complete by 5/31/01)

The P3 Project Training Workgroup identified the broad types of training needed by each priority grouping. Attachment 1 provides the Workgroup matrix of suggested training type/topic needed by each group. Training topics range from specific functional areas of the child support program such as locate, establishment and enforcement, to more general program and community resource orientations. A key component of this step is the involvement of labor representatives to ensure their full participation is attained in the development of the Training Program. The suggested matrix is intended by the Workgroup to be a general reference guide.

In addition, the P3 Project Training Workgroup recommended conducting a more comprehensive training needs assessment to more carefully identify the training needs of those to be include in the Training Program. The Workgroup made suggestions about possible training needs assessment tools. First, the Workgroup developed a draft tool (Attachment 2) identifying key questions that counties should be asked. Second, the Workgroup suggested that consideration be given to the training needs assessment

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tool developed by OCSE. And, finally, the Workgroup suggested that the OCSE/PSI Training Project should provide useful needs assessment data.

DCSS will build upon the work of the P3 Project Training Workgroup to guide the OCSE/PSI Training Project effort to develop a training needs assessment model. The project work plan shows completion of the draft needs assessment model by 2/28/01 and model testing completed by 5/31/01.

B. Inventory Existing Training Resources

The Training Program will be developed by building upon existing best practice training resources available within California, other states or at the federal level. To begin this process requires completion of a comprehensive inventory of currently available training resources, including those specific to the child support program and those available in other program areas. The P3 Project Training Workgroup suggested approach tended to focus specifically on child support program training resources. While DCSS intends to rely heavily upon best practices in the child support program, it is important to explore best practices in “training” as well as training resources that may be available for our use.

The P3 Project Training Workgroup provided a good starting point that will be enhanced by work performed as part of the OCSE/PSI Training Project. PSI will develop and test a training inventory model. Tasks include:

1. Inventory Child Support Program Training Resources (Complete by 5/31/01)

a. Identify Existing Child Support Training Curricula

Identification of existing child support training programs is a critical first step. While the P3 Project Training Workgroup was able to complete preliminary work in this area, additional information gathering will be necessary. The P3 Project Training Workgroup was able to identify, although not evaluate, child support program training materials and resources that are available within other states and at the federal, state, and county level. These resources include federal OCSE, State (DCSS, FTB), local (information collected through SB 1410 surveys), California District Attorney's Association (CDAA), California Family Support Council (CFSC), Judicial Council, and others. Attachment 3 of the Workgroup report lists these training resources and other useful information, e.g., target audience for the training curriculum, subject matter, training title, training content, delivery method, and contact to obtain more information. In addition, Attachment 3 provides information about existing training curricula from members' respective agencies.

It is anticipated that the OCSE/PSI Training Project will complete the inventory of existing child support training programs.

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b. Identify Existing Child Support Program Training Delivery Resources

Identification of existing child support training (non-curricula) resources is an important component of a comprehensive training resource assessment. For example, training delivery methods, frequency of training, training evaluation procedures, training facilities, technology capabilities, and availability of trainers and “training of trainers” programs. The P3 Project Training Workgroup identified these items as important but was unable to gather information due to project time constraints. It is anticipated that the OCSE/PSI Training Project will include these information points in development and implementation of the training program inventory model.

2. Inventory Non-Child Support Program Training Resources (Complete by 5/31/01)

a. Identify Existing Non-Child Support Program Training Curricula

DCSS may want to consider best practices in curricula design that may be useful to the design of child support program training curricula. Other public and private training programs, including those endorsed by labor, exist and may offer some useful insight into the design of the child support Training Program. DCSS will explore options to pursue this avenue within the scope of the OCSE/PSI Training Project.

b. Identify Existing Non-Child Support Program Training Delivery Resources

Identification of existing non-child support training (non-curricula) resources is an important component of a comprehensive training resource assessment. Non-child support training programs may be helpful in identifying best practices and available training resources. For example, training delivery methods, frequency of training, training evaluation procedures, training facilities, technology capabilities, and availability of trainers and “training of trainers” programs. The P3 Project Training Workgroup did not gather information in this area. However, such information will be particularly important when determining resources available to actually deliver training in the quality and magnitude envisioned by the Training Program.

The use of trainers and resources external to the child support program, such as the involvement of Community Colleges, the State Training Center, or other training institutions, could be an important consideration in the successful implementation of the Training Program.

It is anticipated that the OCSE/PSI Training Project will include these information points in development and implementation of the training program inventory model.

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C. Select and/or Develop Quality Training Curricula

The Training Program will develop and implement standard, high quality training curricula based on essential skills and knowledge necessary for each job type/function. The use of DCSS-approved training curricula will be required. To accomplish this task, DCSS will use, to the extent possible, existing best practice child support program curricula that can be readily adopted statewide to gain immediate program improvement and consistency. The P3 Project Training Workgroup found that no mechanism exists to assess the quality of existing training curricula, materials, and resources. It is therefore recommended that DCSS develop such a mechanism. The OCSE/PSI Training Project will include development and testing of a model for assessing the quality of training provided. Tasks include:

1. Evaluate Existing Child Support Program Curricula (Complete by 5/31/01)

The P3 Project Training Workgroup recommended an assessment of training materials currently in use to determine quality. The quality assessment should consider adherence to current program requirements, overall course content, ease of delivery, clarity and understandability, and appropriateness for statewide use. A key consideration in this evaluation is how well the training supports uniform practices throughout the State. Necessary modifications will be made by DCSS based on input received from the Training Advisory Group and the OCSE/PSI Training Project.

2. Identify Training Curricula Development Needs (Complete by 5/31/01)

The P3 Project Training Workgroup also recommended that DCSS identify those areas in which new materials must be developed. A plan should be constructed to develop additional training materials identified as appropriate to support implementation of a statewide, uniform child support Training Program. The OCSE/PSI Training Project will assist DCSS in identifying the specific areas (e.g. customer service training) that must be added to the curricula to ensure child support program uniformity and success.

D. Develop a Comprehensive Training Plan

Upon completion of the preceding tasks, DCSS, in consultation with the Training Advisory Group, will develop a comprehensive Child Support Training Plan that outlines in detail the next steps in development and implementation of a statewide comprehensive, professional Training Program. DCSS recognizes that establishment of a statewide child support Training Program will be occurring within an environment where training organizations and programs are currently operating. Existing organizations provide formal child support training sessions across the State, designed to accommodate county-specific training needs. In addition, many larger counties have in-house training facilities, materials and training staff. DCSS intends to work within this environment to best utilize State, local, public and private training resources to

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efficiently and effectively implement the child support Training Program. Key tasks include:

1. Establish Training Priorities (Complete by 6/30/01)

It is important that training priorities be established and that training be delivered based on determination of highest need, particularly during the early stages of Training Program implementation. DCSS, working with the Training Advisory Group, will develop a prioritized implementation plan that identifies subject matter and target candidates with the greatest training needs. Fiscal Year (FY) 2001-02 will be the first full year for delivery of the first phase of the approved training curricula for the statewide Training Program. DCSS intends to use the Training Program to facilitate statewide uniform policies and practices over the next four to five years in preparation for statewide automation.

2. Establish Certified Trainer Process and Pool (Complete by 6/30/01)

It is important that training curricula be delivered only by professional, competent trainers. DCSS intends to develop and implement a system for certification of trainers deemed competent to deliver the approved training curricula. The DCSS Training Unit will develop and implement a process to certify trainers. Use of the OCSE-approved Training of Trainers Program and/or other mechanisms will be considered in development of this process. The DCSS Training Unit will consider available options for ongoing administration of the trainer certification process.

3. Establish State Curricula Approval Process (Complete by 6/30/01)

It is important that standardized State training curricula and materials be developed and implemented statewide to meet the child support program goals of uniformity and consistency. DCSS intends to develop and implement statewide standardized training curricula that is responsive to program needs and changes. The DCSS Training Unit will lead this effort and will serve as the central repository for standardized training curricula and materials. The DCSS Training Unit will consider available options for ongoing administration of the curricula development effort and centralized training resources library.

4. Make Available a Variety of Training Delivery Methods and Modes (Complete by 6/30/01)

It is important that training be provided in a cost effective manner that recognizes the varying operating needs of local child support agencies. Some counties have extensive training resources available, while others have limited training capability and staffing flexibility to dedicate time away from the job for training. In recognition of these variable needs, DCSS will develop the capability to deliver training through a variety of methods and media. Based on the findings of the training needs assessment and inventory of resources, the DCSS Training Unit will develop necessary mechanisms to meet the

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needs of counties and other stakeholders in training child support staff and the larger child support community. For example, this may include a regionalized approach to on-site training; distance or self-directed learning; web-based training or other approaches as deemed appropriate.

5. Evaluate Training Delivered and Results (Complete by 6/30/01)

It is important that each training session be evaluated in terms of course content, trainer effectiveness, and results, i.e., proficiency factor. The issue of proficiency evaluation or testing is a complicated issue that will require more careful analysis and working with labor to ensure their issues and concerns are identified and resolved (see “F” below). The DCSS Training Unit will establish necessary training evaluation mechanisms to ensure that training curricula, delivery, and intended results remain strong and continue to support clear, statewide uniform practices.

6. Financing (6/30/01)

DCSS intends to contribute the necessary resources to implement an effective statewide child support Training Program. DCSS is in the planning stages of an effort to develop a new LCSA Annual Budget Allocation Methodology, with implementation beginning in FY 2001-02. DCSS has requested representation from the IV-D Directors Association to participate in this effort. However, it is likely that Training will be considered a separate component of local child support agency budgets. Funding for training will be a topic of future discussion but will be a priority area for DCSS.

E. Practice Continuous Quality Improvement

An effective Training Program must include a process for ongoing evaluation and improvement to reflect changes in program requirements, policies and practices. This important linkage is in addition to ongoing evaluation of training delivered. Since the child support program is undergoing significant reform, it will be especially important that the Training Program is directly linked to the DCSS policy and issue resolution process. DCSS is using a single, centralized process to address policy development and issue resolution stemming primarily from statewide automation, county administrative transitions, P3 Project, and ongoing policy development and implementation (e.g., new legislation, new case law, proposed new regulations and policies). There must be a mechanism to directly link the Training Program to the policy and issue resolution process to permit modification of existing and development of new training curricula/materials.

In addition, there are other significant sources of input to the Training Program if it is to meet our intent of being dynamic and responsive to an evolving child support program. The Training Program must be linked to DCSS oversight and performance monitoring system as well as to program performance measures. In the near term, DCSS will consider how to link the Training Program with information gathered from county

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performance reviews; customer services satisfaction surveys; customer complaint processes including local complaint resolution, ombudsperson program, and state hearings; and other performance-related information. Not only should these sources provide information to identify specific problems areas (perhaps county specific issues), but also to identify where training curricula may need to be modified and/or developed.

DCSS will provide the leadership to design the appropriate feedback and input mechanisms to the Training Program to ensure that it is dynamic and responsive to the evolving needs of the child support program.

F. Develop Professional Standards and Recognition Program

It is the intent of DCSS to enhance the professional status of those who work within the child support program. DCSS is interested in developing a workforce that is highly skilled and expert in the delivery of child support program services. DCSS believes that the investment in our human resources is fundamental and will directly translate to the quality of services provided to the public. Therefore, the DCSS is interested in exploring options to raise, recognize, and reward staff professional competency levels.

1. Evaluate Staff Competency Levels

Implementation of the statewide Training Program will require a process to determine who will be required to participate in training and evaluate staff competency levels (pre- and post-training). It is assumed that all employees who are new to the child support program will be required to participate in the established training program. However, employees who currently or have previously worked in the child support program may be subject to different training requirements. For example, it may be appropriate to “grandfather” or otherwise exempt current employees from some or all of the training, design a modified training program that covers key elements (recent changes in program philosophy, policy and practice), and/or design an assessment tool to measure key competencies.

In addition, the methods used to evaluate post-training staff competencies will be critically important and could have significant labor relation’s ramifications. It is assumed that some agreed upon methodology will be employed to determine staff competency levels and evaluation techniques will be carefully constructed to ensure fair and equitable implementation statewide. Consideration of the need for various approaches to evaluation of staff competencies for current versus newly hired child support staff. The intent is to raise staff competency levels, but to do so in a constructive manner that does not disadvantage current employees.

2. Enhance Professional Recognition and Standing

DCSS is interested in examining the feasibility and merit of establishing a child support professional recognition program such as credential, certification, accreditation, or other

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generally recognized program. The purpose of such a program would be to raise the professional standing of those who belong by bestowing a publicly recognized standard of excellence.

The P3 Project Training Workgroup gave preliminary consideration to establishment of a staff certification program. Such a program would be intended to upgrade competency levels, increase job pride, enhance public confidence, and prepare workers to deliver consistent service to the public statewide. The Workgroup found, however, that they were unable to answer many questions within the time constraints of the project. The questions included: *Who should administer the program? What will the review process be? How could outside trainers be used in a certification program? Will certification influence job assignment, pay level, and other union issues? How will veteran staff be certified? Will certification for non-child support employees be offered?* It was clear to the Workgroup that more study is required.

DCSS intends to pursue options in this area to determine the feasibility of establishing a professional recognition program.

ATTACHMENTS

ATTACHMENT 1: TRAINING RESOURCE MATRIX

ATTACHMENT 2: ASSESSMENT TOOL

ATTACHMENT 3: RESOURCE LIST

